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M. SUBPART AA – PROCESS VENTS

M.1 Definition of Process Vent

In accordance with the Code of Federal Regulations (CFR), 40 CFR 264.1031, a process vent is any open-ended pipe or stack that is vented to the atmosphere either directly, through a vacuum-producing system, or through a tank associated with hazardous waste distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations. CS Clean Solutions, Inc. (CS Clean) purges each spent column through one clean Cleansorb column prior to being exhausted to the atmosphere. As such, the facility operates one process vent.

M.2 Applicability

CS Clean is applying for a hazardous waste treatment, storage, and disposal facility permit, and is required to assess its operations for applicability under Subpart AA. The facility contains one process vent, as defined in 40 CFR 264.1031, used to purge spent columns through one clean Cleansorb column.

Subpart AA would apply if the process vent were associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations that manage hazardous waste with organic concentrations of at least ten parts per million (10 ppm).

There is no known organic content in any of the waste received and treated by CS Clean . Organic concentrations are expected to be below 10 ppm, and as such, treatment of hazardous waste at the facility will not include any distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping of hazardous waste. Therefore, CS Clean is not subject to Subpart AA.